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August 29, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York, 10007

Re: *United States v. Lira*, 22-CR-151 (LGS)

Dear Judge Schonfield:

I am the attorney for the defendant in the above-referenced matter. I am writing to respectfully request that the Court extend the pretrial deadlines by one additional week, making the deadline for the filing of pretrial motions September 5, 2022, with responses due October 6, 2022, and replies due by October 19, 2022. I have consulted with the attorney for the United States, and the Government is in agreement with this modification to the dates previously set in the Memorandum Order (ECF Doc. No. 11), which were modified one time previously by Memorandum Order (ECF Doc. No. 20).

I am requesting this one additional week due to unforeseen personal and professional travel required in the past two weeks, which impeded my ability to finish the pretrial motions. The initial one-month extension was requested because the discovery production had been extended by one month. As mentioned in my prior letter motion, the amount of discovery in this case is substantial and includes downloads of several electronic devices.

We are currently scheduled for a status conference on October 3, 2022. It was not rescheduled after the prior extension for pretrial motions. As this date was intended to be approximately one month after the completion of briefing on pretrial motions, we would also request that the Court also reset that date for approximately one month and one week.

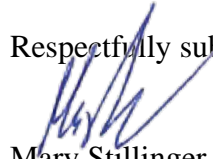
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The parties agree that the delay due this modification of the scheduling order is excludable under the Speedy Trial Act, 18 U.S.C. §3161, *et seq.*, as the defense needs additional time to review the discovery and prepare pretrial motions. Accordingly, we would request that the Court find that the ends of justice served by excluding this time outweigh the Defendant's and the public's interest in a speedy trial, making any delay occasioned by this request excludable pursuant to 18 U.S.C. §3161(h)(7)(A).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Mary Stillinger', is written over the typed name.

Mary Stillinger